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S.D. OF N.Y.

The Honorable James L. Cott  
United States District Court  
Southern District of New York  
500 Pearl Street  
Courtroom 21D  
New York, NY 10007

RE: Response to defendants' August 3, 2017 supplemental letter for Case 15-CV-09376

August 7, 2017

Dear Honorable Judge Cott,

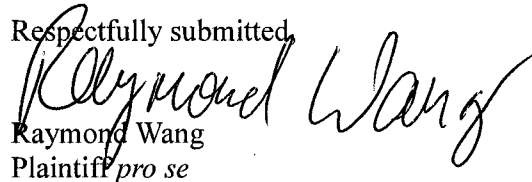
I write in response to the defendants' supplemental letter filed on August 3, 2017. I, the plaintiff, have no knowledge of the accuracy of the statements as set forth in the letter or who Thomas Lextrait is. Clearly, this domain is a widely used dictionary word that many entities, business, and individuals use globally and daily. Therefore, this honorable court must issue both the declaratory and the maximum monetary relief.

I thank the defendants' counsel for **admitting in the letter that the defendants have not "renewed" the domain in dispute.** To have the ability to choose to renew or not renew a domain, they must own it at that specific point in time. This carefully chosen language clearly shows ownership and clarifies who owned the domain at the point in time when it expired. This answers the Honorable Judge Engelmayer's previous question of whether the defendants ever had ownership and control of the domain. They certainly did.

In short, I lawfully registered the domain. Then, the defendants abused the UDRP process to hijack and gain ownership of the domain. After that, the defendants failed to renew it, as defendant counsel admitted in their August 3<sup>rd</sup>, 2017, letter. This begs the question as to why the defendants went through with the UDRP process in the first place.

However, this case is not about who Thomas Lextrait is or why the plaintiff did not reregister the domain. They are irrelevant to this case. This case is about the defendants' successful domain hijacking by abusing the UDRP process.

Respectfully submitted,



Raymond Wang  
Plaintiff *pro se*

Cc: Ben Quarmby (bquarmby@mololamken.com)